| 1      |   | The Honorable Barbara J. Rothstein                        |
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| 7<br>8 | UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA                 |   |
| 9      | Kevin D. Anthony, individually,   | CASE NO. C19-5337-BJR                                     |
| 10     | Plaintiff,  | STIPULATED MOTION AND ORDER                               |
| 11     | v.  | FOR EXTENSION OF TIME TO SUBMIT PROPOSED FINDINGS OF FACT |
| 12     | United States of America,   | AND CONCLUSIONS OF LAW                                    |
| 13     | Defendant.  |   |
| 14     |   |   |
| 15     | The Parties, by and through their undersigned counsel, jointly stipulate and respectfully     |   |
| 16     | move the Court for an extension of time to submit proposed findings of fact and conclusions o |   |
| 17     | law, from the current deadline of December 20,  | 2021 until January 3, 2022.                               |
| 18     | In order to assist with the proposed findings of fact, the parties have requested the tria    |   |
| 19     | transcript and have been informed it will not be completed until approximately December 16    |   |
| 20     | 2021. Furthermore, counsel for Defendant will   | be out of the country and without access to her           |
| 21     | work computer from December 11, 2021 until December 19, 2021. Counsel for Plaintiff also ha   |   |
| 22     | scheduling conflicts over the holidays.   |   |
| 23     | //  |   |
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| 1        | Therefore, the parties stipulate and agree that good cause exists for an Order extending     |  |
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| 2        | the deadline from December 20, 2021 until January 3, 2022, and respectfully request an Order |  |
| 3        | from the Court allowing this additional time.  |  |
| 4        |  |  |
| 5        | DATED this 9th day of December, 2021.  |  |
| 6        | SO STIPULATED AND RESPECTFULLY SUBMITTED,  |  |
| 7        | JAMES J. RAFFA, PLLC   |  |
| 9        | <u>s/ James J. Raffa</u><br>JAMES J. RAFFA, WSBA #20394                                      |  |
| 10       | 201 Saint Helens Avenue<br>Tacoma, WA 98402<br>Telephone: 253-927-7337                       |  |
| 11       | Email: james@raffalaw.com  |  |
| 12       | Attorney for Plaintiff   |  |
| 13       |  |  |
| 14<br>15 | NICHOLAS W. BROWN United States Attorney   |  |
| 16       | <u>s/ Kristen R. Vogel</u><br>KRISTEN R. VOGEL, NY No. 5195664                               |  |
| 17       | Assistant United States Attorney Western District of Washington                              |  |
| 18       | United States Attorney's Office 700 Stewart Street, Suite 5220                               |  |
| 19       | Seattle, Washington 98101-1271<br>Phone: 206-553-7970  |  |
| 20       | Email: kristen.vogel@usdoj.gov   |  |
|          | Attorney for the United States   |  |
| 21       |  |  |
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| 23       | .l   |  |

| 1  | ORDER  |
|----|--|
| 2  | IT IS SO ORDERED.                                    |
| 3  |  |
| 4  | DATED this 14th day of December, 2021.               |
| 5  | Barbara Rothitein                                    |
| 6  | BARBARA J. ROTHSTEIN<br>UNITED STATES DISTRICT JUDGE |
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